

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

JOHN THIBODEAUX, AMY THIBODEAUX	:	
GABRIELLE THIBODEAUX, AND EMILY	:	Civil Action 6:18-00501
THIBODEAUX	:	
	:	Judge:
VERSUS	:	
	:	
J.M. DRILLING, LLC, ADMIRAL INSURANCE	:	Magistrate:
COMPANY, ROCKHILL INSURANCE	:	
COMPANY, AND BELL SOUTH	:	
TELECOMMUNICATIONS, LLC	:	

**REPLY TO OPPOSITION TO MOTION TO TRANSFER BY
BELLSOUTH TELECOMMUNICATIONS, LLC**

NOW INTO COURT, through undersigned counsel, comes Defendant, ROCKHILL INSURANCE COMPANY (hereinafter sometimes referred to as “Rockhill”), who respectfully offers this Reply to the *Memorandum of Intervenor, Claimant in Cross Claim, and Claimant in Counter Claim, in Opposition to Motion to Transfer* filed by BellSouth Telecommunications, LLC (“Bellsouth”) (Doc. 20).

MAY IT PLEASE THE COURT:

In its Opposition, Bellsouth states that it adopts and incorporates in full the arguments set forth by the Thibodeauxs in their *Opposition to Motion to Transfer* (Doc. 18). (Doc. 20, pg. 1). Accordingly, in response to Bellsouth's adoption, Rockhill asserts herein the same arguments as previously made in *Reply to Plaintiffs' Opposition to Motion to Transfer*.

WHEREFORE, Defendant, ROCKHILL INSURANCE COMPANY, respectfully asks that this Honorable Court grant *Defendant's Motion to Transfer* and stay all

proceedings in the above captioned matter until the West District of Tennessee, Eastern Division can adjudge whether to consolidate the actions.

CERTIFICATE OF SERVICE

Respectfully Submitted,

I HEREBY CERTIFY that on the 14th day PERKINS & ASSOCIATES, LLC:

of June 2018 I filed the foregoing *Reply to* By: /s/ Mark A. Perkins
Opposition Motion to Transfer by Bellsouth Mark A. Perkins, #18529
Cody Grosshart, #37143

Telecommunications, LLC with the 401 Market St., Suite 900
Shreveport, LA 71105
CM/ECF system through which a copy T: (318) 222-2426
F: (318) 222-0456
was provided to all counsel of record.

/s/ Mark A. Perkins